

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
	*	CASE NO. 13-07632/MCF
ELSIE CATALINA DIAZ AYALA	*	
	*	CHAPTER 13
DEBTOR	*	

**MOTION REQUESTING ORDER FOR AUTHORIZATION TO BEGIN EVALUATION
OF LOSS MITIGATION WITH MORTGAGE CREDITOR**

TO THE HONORABLE COURT:

NOW COMES, ELSIE CATALINA DIAZ AYALA, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. Debtor is the owner of a residential property encumbered by a mortgage in favor of creditor Rushmore Loan Mortgage Services ("*Rushmore*"), claim no. 3-2.
2. The debtor approached Rushmore to begin evaluation for a loss mitigation or loan modification of the mortgage loan with Rushmore. Creditor has requested an Order from this Honorable Court in order to begin the evaluation for loss mitigation or mortgage loan modification with the debtor.
3. Therefore, the debtor respectfully requests an Order from this Honorable Court authorizing debtor to meet with Rushmore to begin the evaluation for loss mitigation or mortgage loan modification.

WHEREFORE, the debtor respectfully requests this Honorable Court to take notice of the aforementioned and enter an Order approving authorization for the debtor to initiate a loss mitigation or loan modification evaluation with secured creditor Rushmore, in the above captioned case.

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Motion requesting authorization to begin Loss Mitigation
Case no. 13-07632/MCF13

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 1009(b)

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9013(c) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee, José Ramón Carrión Morales, Esq., Rebeca Caquíás Mejías, Esq., Fiddler, González & Rodríguez, PSC, Counsel for Rushmore; I also certify that a copy of this motion was sent via US Mail to: Elsie Catalina Díaz Ayala, PMB 2283 PO Box 6400, Cayey, PR 00737, debtor in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 27th day of February, 2015.

/s/ Roberto Figueroa Carrasquillo
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